

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SUSAN FREDRICKSON,)	
	Plaintiff,)
v.)	Case No. 07 C 6157
)	
VILLAGE OF WILLOW SPRINGS, ALAN)	Judge Grady
NOWACZYK, and ANNETTE KAPTUR,)	Magistrate Judge Nolan
)	
	Defendants.)

**MOTION FOR LEAVE TO FILE LEGAL BRIEF
IN EXCESS OF FIFTEEN PAGES INSTANTER**

Now Come the Defendants, Village of Willow Springs, Alan Nowaczyk, and Annette Kaptur, by and through their attorneys, Odelson & Sterk, Ltd., and John Murphey, and hereby request that this Court grant the Defendants leave to file a seventeen (17) page Reply Brief in Support of their Motion to Dismiss. In support of this Motion, Defendants state as follows:

1. The Plaintiff has filed a Six Count Complaint against Defendants, Village of Willow Springs, Alan Nowaczyk, and Annette Kaptur.
2. Defendants have filed a Motion to Dismiss and Memorandum in Support of their Motion.
3. Plaintiff's Complaint contains various constitutional issues, as well as issues concerning the Illinois Municipal Code and Election Code.
4. The legal issues before this Court are numerous.
5. Defendants' Reply Brief in Support of the Motion to Dismiss is seventeen (17) double-spaced pages in length.

6. It was necessary for Defendants to quote extensively from the Illinois Municipal Code and Illinois Election Code to fully address their arguments, which caused their Reply Brief to exceed this Court's fifteen (15) page limit.

WHEREFORE, the Defendants, Village of Willow Springs, Alan Nowaczyk, and Annette Kaptur, respectfully request that this Honorable Court enter an order granting the Defendants leave to file a Reply Brief in support of their Motion to Dismiss in excess of 15 pages, instantaneously, plus whatever other relief this court deems just and appropriate.

Respectfully Submitted,

VILLAGE OF WILLOW SPRINGS

By: s:/ Michael J. McGrath

ALAN NOWACZYK and ANNETTE KAPTUR

By: /s:/ John Murphey

Michael J. McGrath
ODELSON & STERK, LTD.
3318 W. 95th Street
Evergreen Park, IL 60805
708-424-5678

John B. Murphey
Rosenthal, Murphey & Coblenz
30 N. LaSalle Street
Suite 1624
Chicago, IL 60602
312-541-1070